

SCANNED ORIGINAL

Andrew B. Messite (ABM-3748)
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599 Lexington Avenue
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Telephone (212) 521-5445

Attorneys for Defendant Bank of America, N.A.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NANCY PASCAL, individually and on
behalf of a class,
Plaintiff,

v.

ALLAN P. FEIGELSON, individually and doing
business as ALLAN P. FEIGELSON, a
dissolved corporation, and BANK OF AMERICA,
N.A.,
Defendants.

08 CV 0550 (SCR)

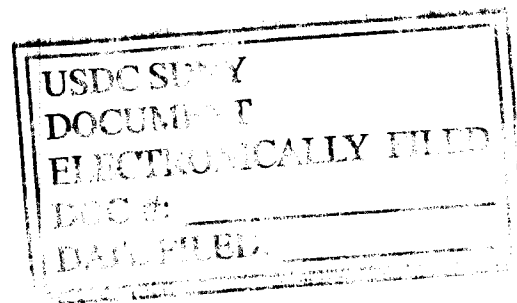
NOTICE OF MOTION

S.D. OF N.Y.

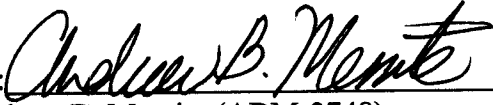
FILED
U.S. DISTRICT COURT
MAR 26 PM 2:55

PLEASE TAKE NOTICE that upon the accompanying affidavits of Andrew B. Messite, sworn March 19, 2008 and Dianna C. Wyrick sworn to March 20, 2008 and the exhibits annexed thereto, and upon all prior proceedings had herein, defendants Bank of America, N.A. will move this Court, Hon. Stephen C. Robinson at the United States Courthouse, 300 Quarropas St., White Plains, NY 10601, at a date and time to be designated by the Court, for an Order, pursuant to Local Civil Rule 1.3(c), admitting Dianna C. Wyrick to the bar of this Court, pro hac vice, solely for the purpose of representing defendant Bank of America, N.A. in connection with the above-captioned action, and for such other and further relief as this Court deems proper.

Dated: New York, New York
March 20, 2008



REED SMITH LLP

By: 

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Counsel for Allan P. Feigelson and Allan P. Feigelson, P.A.

ORIGINAL

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 New York, New York 10022
 Telephone (212) 521-5445

Attorneys for Defendants Bank of America, N.A.

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

-----X
 NANCY PASCAL, individually and on
 behalf of a class,

Plaintiff,

v.

ALLAN P. FEIGELSON, individually and doing
 business as ALLAN P. FEIGELSON, P.A.,
 a dissolved corporation, and BANK OF AMERICA,
 N.A.,

Defendants.

Case No. 08 CV 0550 (SCR)

**AFFIDAVIT OF ANDREW
 B. MESSITE IN SUPPORT
 OF MOTION TO ADMIT
 COUNSEL
PRO HAC VICE**

 STATE OF NEW YORK)
 : ss.:
 COUNTY OF NEW YORK)

Andrew B. Messite, being duly sworn, hereby deposes and says as follows:

1. I am a member of Reed Smith LLP, counsel for Defendant Bank of America, N.A. in connection with the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of my motion to admit Dianna C. Wyrick as counsel *pro hac vice* to represent Defendant Bank of America, N.A.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1990. I am also admitted to the bar of the United States District Courts for the Southern and Eastern Districts of New York, and am in good standing in each Court.

3. Ms. Wyrick is a member of Reed Smith LLP, in Pittsburgh, Pennsylvania.

4. I have found Ms. Wyrick to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure and the Local Rules of this Court.

5. Accordingly, I am pleased to move the admission of Dianna C. Wyrick.

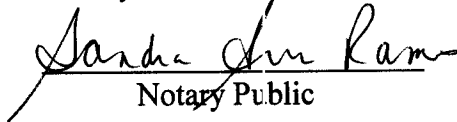
6. I respectfully submit a proposed order granting the admission of Dianna C.

Wyrick, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Dianna C. Wyrick, *pro hac vice*, to represent Defendant Bank of America, N.A. in the above-captioned matter, be granted.


ANDREW B. MESSITE (ABM-3748)

Sworn to before me this
19th day of March, 2008.


Notary Public

SANDRA ANCHUNDIA-RAMOS
Notary Public, State of New York
No. 31-4919484
Qualified in Queens County
Commission Expires February 16, 20 10

EXHIBIT A

ORIGINAL

Andrew B. Messite (ABM-3748)
REED SMITH LLP
599 Lexington Avenue
New York, New York 10022
Telephone (212) 521-5445

Attorneys for Defendants Bank of America, N.A.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
NANCY PASCAL, individually and on	:
behalf of a class,	:
	:
Plaintiff,	:
	:
v.	:
	:
ALLAN P. FEIGELSON, individually and doing	:
business as ALLAN P. FEIGELSON, P.A.,	:
a dissolved corporation, and BANK OF AMERICA,	:
N.A.,	:
Defendants.	:

08 CV 0550 (SCR)

**AFFIDAVIT OF
DIANNA C. WYRICK
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

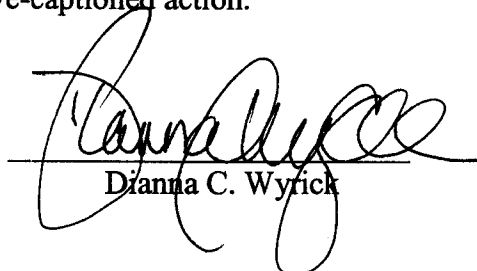
STATE OF PENNSLYVANIA)
 :ss.:
COUNTY OF ALLEGHENY)

DIANNA C. WYRICK, being duly sworn, hereby deposes and says:

1. I am a member of the Bar of the State of Pennsylvania. I submit this affidavit in support of my application, pursuant to Local Civil Rule 1.3(c), to be admitted pro hac vice for the purposes of representing defendants in connection with the above-captioned action. I have personal knowledge of the facts set forth below.

2. Attached hereto as Exhibit "A" is an original certificate which certifies that I am a member in good standing of the bar in the Commonwealth of Pennsylvania.

WHEREFORE, I respectfully request the Court to grant my application, pursuant to Local Civil Rule 1.3(c), to be admitted pro hac vice for the purpose of representing defendants in connection with the above-captioned action.


Dianna C. Wylick

Sworn to before me this
20 th day of March, 2008

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Sandra L. Vogel, Notary Public
Hampton Twp., Allegheny County
My Commission Expires Feb. 11, 2010
Member, Pennsylvania Association of Notaries

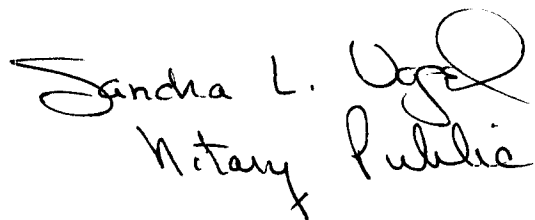

Sandra L. Vogel
Notary Public

EXHIBIT A



Supreme Court of Pennsylvania

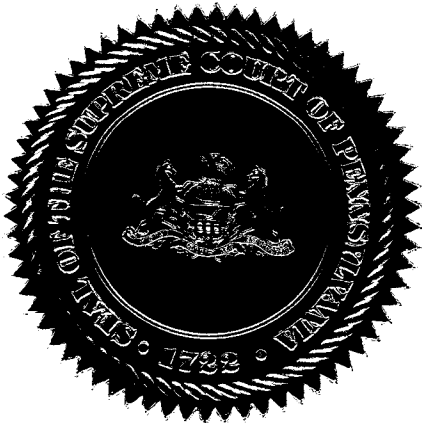
CERTIFICATE OF GOOD STANDING

Dianna Calaboyias Wyrick, Esq.

DATE OF ADMISSION

January 27, 1995

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: March 13, 2008

A handwritten signature in cursive script, reading "Patricia A. Nicola".

Patricia A. Nicola
Chief Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NANCY PASCAL, individually and on behalf
of a class, ,

Plaintiff,

v.

ALLAN P. FEIGELSON, individually and
doing business as ALLAN P. FEIGELSON,
P.A., a dissolved corporation, and BANK OF
AMERICA, N.A.,

Defendants.

No.: 08 CV 0550 (SCR)

PROOF OF SERVICE

STATE OF NEW YORK)

ss.

COUNTY OF NEW YORK)

Saritha C. Reddy, being duly sworn, deposes and says that: Deponent is not a party to this action, is over 18 years of age and is employed by Reed Smith, 599 Lexington Avenue, New York, New York, 10022.

On March 26, 2008, Deponent served the within:

- 1 Notice of Motion to Admit Counsel Pro Hac Vice;
- 2 Affidavit of Andrew B. Messite In Support of Motion to Admit Counsel Pro Hac Vice and supporting documents;
- 3 Affidavit of Dianna C. Wyrick In Support of Motion to Admit Counsel Pro Hac Vice and supporting documents upon the following:

Abraham Kleinman
Kleinman LLC
626 Rex Corp Plaza
Uniondale, NY 11556-0626

Cathleen M. Combs
Edelman, Combs, Lattuner & Goodwin, LLC
120 S. LaSalle Street
Suite 1800
Chicago, IL 60603

Jamie Rebecca Wozman
Shelowitz Broder LLP
11 Penn Plaza, 5th Floor
New York, NY 10001

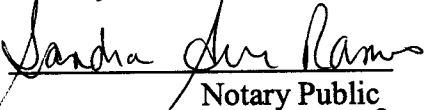
Mark K. Anesh
Wilson, Elser, Moskowitz, Edelman & Dicker LLP
150 East 42nd Street
New York, NY 10017

by depositing a true copy thereof enclosed in a securely sealed, properly addressed by First Class Mail, in an official depository under the exclusive care and custody of the United States Post Office within the City, County and State of New York.



Saritha C. Reddy

Sworn to before me this
26th day of March, 2008



Notary Public

SANDRA ANCHUNDIA-RAMOS
Notary Public, State of New York
No. 31-4919484
Qualified in Queens County
Commission Expires February 16, 20 10